

PRIVACY POLICY

1. GENERAL

1.1 This Privacy Policy ("Policy") explains in general terms how Locomote Technologies Trading Pty Ltd and its related bodies corporate ("Locomote", "we", "our" or "us") protect the privacy of your personal information and collects, stores, uses and discloses your personal information. We have developed this Policy in line with the Australian Privacy Principles in the Privacy Act 1988 (Cth) ("Privacy Act").

1.2 We are firmly committed to protecting the privacy and confidentiality of personal information and maintain robust physical, electronic and procedural safeguards to protect personal information in our care.

1.3 By using, browsing or accessing the Locomote website ("website"), you indicate that you have read, understood and accept this Policy and agree to abide by it. You agree that your use of our products, services or site implies your consent to the terms of this Policy.

1.4 We are committed to the protection, privacy and security of your personal information and we have developed this Policy in line with the Australian Privacy Principles in the Privacy Act.

1.5 This Policy applies in general terms to the collection, storage, use and disclosure by us of your personal information, how you may access personal information that we keep or complain about a suspected privacy breach.

2. WHAT IS PERSONAL INFORMATION?

2.1 Personal information is information or an opinion, in any form (whether true or not) about an individual whose identity is apparent or can reasonably be ascertained from the information or opinion.

3. COLLECTION OF YOUR PERSONAL INFORMATION?

3.1 Where practical we will collect personal information directly from you. Generally this will be collected by us when you deal with us either in person, by telephone, letter, facsimile, email or when you visit, access or use our website, our travel management platform or other technology or any products or services contained therein.

3.2 We may request information about you when you acquire or make enquires about products and services or when you request brochures or other information. We may also collect information when we invite you to complete surveys, questionnaires or provide us with feedback.

3.3 We do not use or share your personal information for any purpose other than for the purpose for which it was disclosed.

3.4 We may collect personal information about you for our related bodies corporate and service providers and when you request information about products and services. We will only collect personal information that is necessary for one or more of our functions or for the purpose disclosed to you.

3.5 Where we collect personal information directly from you, we will take reasonable steps to notify you of certain matters in a collection notice. We will do this at or before the time of collection, or as soon as practicable afterwards. Collection notices provide more specific information than this Policy in relation to particular collections of personal information.

3.6 If you provide to us personal information about someone else (as their authorised representative), we rely on you to inform them that you are providing their personal information to us and to advise them that we can be contacted for further information. You must take reasonable steps to ensure the individual concerned is aware of or consents to the various matters detailed in this Policy, including the fact that their personal information is being collected, the purposes for which that information is being collected, the intended recipients of that information, the individual's right to obtain access to that information, our identity, and how to contact us. Where requested to do so by us, you must also assist us with any requests by the individual to access or update the personal information you have collected from them and provided to us.

4. WHAT PERSONAL INFORMATION DO WE COLLECT?

4.1 Generally, the type of personal information we collect about you depends on the type of dealings that you have with us and includes the information that is needed to facilitate the operation of our travel management platform and other technology and the provision of our products and services to you. For example, we may collect details such as your name, mailing address, telephone number, mobile number, email address, next of kin details and passport details. We also collect information that is required for use in the business activities of Locomote, including for example, financial details necessary in order to process various transactions and any other information you may elect to provide to us.

4.2 We do not wish to collect information about visitors which is *sensitive information* as defined under the Privacy Act. However, if the information is reasonably necessary for one or more of our functions or activities, then we are required by law to obtain your consent to the collection of such sensitive information unless subclause 3.4 of schedule 1 part 2 to the Privacy Act applies in relation to the information. We will assume that you have consented to the collection of all information which is provided to us for use in accordance with this Policy, unless you tell us otherwise.

5. WHEN WE ACT AS SOFTWARE PROVIDER

5.1 When products and services are provided via our travel management platform or other technology we usually collect personal information about you, both for our internal purposes, and on behalf of the parties who are providing the products and services via our travel management platform for their internal purposes. Accordingly, the consent you provide under this policy to the collection of personal information by us, applies equally to those third parties.

6. HOW DO WE USE PERSONAL INFORMATION?

6.1 We will use your personal information to provide you with our products and services. We also use it to improve our service and to notify you of opportunities that we think you might be interested in.

6.2 We may use and disclose your personal information for the purposes for which it was collected, or for a related or ancillary purpose such as any one or more of the following purposes:

- (a) identification of fraud or error.
- (b) regulatory reporting and compliance.
- (c) developing, improving and marketing our products and services.
- (d) servicing our relationship with you by, among other things, providing updates on promotions, products and services we think may interest you.
- (e) involving you in market research gauging customer satisfaction and seeking feedback regarding our relationship with you.
- (f) to facilitate your participation in loyalty programs.
- (g) to analyse trends in sales and travel destinations.
- (h) for marketing activities.
- (i) for internal accounting and administration purposes.

7. IS THE INFORMATION DISCLOSED TO THIRD PARTIES?

7.1 We may disclose your personal information:

- (a) as permitted or required by law.
- (b) to various regulatory bodies and law enforcement officials and agencies, including to protect against fraud and for related security purposes.
- (c) to our third party service providers, such as marketing and analysis organisations, financial and credit card institutions in order to process any payments, hosting companies, web developers, internet service providers, customer service providers, customer support specialists, fulfilment companies and external business advisors (such as auditors and lawyers).
- (d) to third parties participating in our travel management platform.
- (e) to third parties such as airlines, hotels, car rental companies and other service providers for the purpose for which the information was collected or for a related purpose.
- (f) to third parties who may involve you in market research for the purpose of servicing our relationship with you and improving the services we provide.
- (g) to third parties for the purpose of us being able to analyse trends in sales and travel destinations.
- (h) to our subsidiaries, holding company, related entities, related bodies corporate and joint venture partners.

7.2 The third parties to whom we disclose your personal information may also be taken to have collected your personal information in their own right, for their internal use.

7.3 Where we engage third party contractors to perform services for us, those third party contractors may be required to handle your personal information. Under these

circumstances those third party contractors must safeguard this information and must only use it for the purposes for which it was supplied.

7.4 Other than as set out in this Policy or a collection notice, we will not disclose your personal information without your consent unless disclosure is necessary to prevent a threat to life or health, authorised or required by law, regulation, legal process, governmental request or industry code, or otherwise reasonably necessary to enforce the law or necessary to investigate a suspected unlawful activity.

7.5 In all circumstances where your personal information is disclosed, we will ensure that these third parties undertake to protect your privacy.

7.6 In the event of a merger, acquisition, sale of the whole or part of our business or restructure, we reserve the right to transfer your personal information as part of any such transaction. However, your personal information would remain subject to this Policy.

8. TRANS-BORDER DATA FLOWS

8.1 In providing our products or services to you it may be necessary for us to forward your personal information to relevant overseas third party service providers. In particular, as at the date this Policy was most recently updated, your personal information may be disclosed to recipients in United States of America, India, Singapore, Poland, Russia and the United Kingdom and other countries from time to time. If you subsequently decide that you do not wish to receive information from them you may let us know by contacting contact@locomote.com.

8.2 Prior to the disclosure of personal information to a person overseas, we will take such steps as reasonable in the circumstances to ensure that the overseas recipient treats your personal information securely and otherwise complies with the relevant Australian Privacy Principles in relation to the personal information.

9. SECURITY OF INFORMATION

9.1 Locomote has implemented physical, electronic and managerial security procedures (including SSL encryption) and will use its reasonable endeavours to protect personal information and credit card details from loss, misuse, alteration or destruction. Locomote regularly reviews security and encryption technologies and will strive to protect information to the fullest extent possible.

9.2 Despite our reasonable endeavours, we are unable to ensure or warrant the security of any personal information transmitted to us. Accordingly, all personal information disclosed by you to us is at your own risk and we are not liable for any unauthorised access to the personal information.

10. THIRD PARTY SITES

10.1 Although our website may contain hyperlinks or banner advertising to or from external websites, those websites are not subject to our privacy standards, policies and procedures. We recommend that you make your own enquires as to the Privacy Policies of these third parties.

10.2 We are in no way responsible for the privacy practices of these third parties.

10.3 This Policy applies only to the information we collect on our website.

11. ACCESS AND CORRECTION OF PERSONAL INFORMATION

11.1 We will use our reasonable endeavours to keep your personal information that we collect accurate, up-to-date and complete within 21 days of receipt of your enquiry. Subject to the exceptions set out in the Privacy Act, we invite you to access and correct any personal information we may hold on you by contacting contact@locomote.com.au. If we deny access, we will provide you with the reason for such denial. We may recover from you our reasonable costs of supplying you with access to this information. Proof of identity may be required before such information will be provided.

12. OPT-OUT

12.1 Where we have your express or implied consent, or where we are otherwise permitted by law, we may use your personal information to send you information about the promotions, products or services we offer, as well as other information. We may send this information by mail, email, SMS and telephone.

12.2 Should you no longer wish to receive these communications, you are entitled to unsubscribe at any time by email to contact@locomote.com.au or by using the unsubscribe facility that we include in our commercial electronic messages (ie email or SMS) to opt out of receiving those messages.

13. USE OF COOKIES

13.1 A cookie is a small piece of text that is placed within the memory of a computer and can be later retrieved by web page servers. When you visit our website, details are recorded about your visit, such as time and date, your server address, pages accessed, time spent and type of browser so that next time you visit our website we remember your log in details. This information is used in an anonymous form for statistical purposes and as such cannot identify you individually. We use cookies to enhance your interaction and convenience with our website and do not use cookies to record any personal information. If you do not wish to use cookies, you can adjust the settings on your browser to reject cookies or notify you when they are being used. If you reject our cookies, you may still use our website, but you may be limited in the use of some of the features and this may affect the functionality of our website.

14. LINKED SITES

14.1 We may link or reference to or from other sites or third parties. We are not responsible for the privacy practices, policies or the content of such websites or third parties. We encourage you to read the privacy statements of these third parties as their privacy policy may differ from ours.

14.2 We are in no way responsible for the privacy practices of these third parties.

14.3 This Policy applies only to the information we collect on our website.

15. FEEDBACK / COMPLAINTS

15.1 We welcome your inquiries or comments about our Policy. Should you have any comments or complaints please email contact@locomote.com or write to the Privacy Officer at 42 Barkly Street, St.Kilda, Victoria, 3182 and provide us with full details.

15.2 Our Privacy Officer will endeavour to:

- (a) provide an initial response to your query or complaint within 10 business days, and
- (b) investigate and attempt to resolve your query or complaint within 30 business days or such longer period as is necessary and notified to you by our Privacy Officer.

16. CHANGES TO OUR POLICY

16.1 From time to time it may be necessary for us to review and revise this Policy. We reserve the right to change our Policy at any time, should this occur the amendment would be posted on our website. Your continued use of our products, services or website following any such amendment will be confirmation of your acceptance of the amendments. We reserve the right to modify this Policy at any time, so please review it frequently.